

1 Honorable Robert J. Bryan
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON AT TACOMA
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10 RALPH W. CLOSE and LAURA A. LARSON,
11 individually as parents of the decedent JAMES
12 ROBERT CLOSE,

13 Plaintiffs,

14 v.

15 PIERCE COUNTY, WASHINGTON; PIERCE
16 COUNTY SHERIFF PAUL PASTOR; STEVE
17 PARR; EDWARD CORRELL; JOSEPH
18 GORMAN; and TODD KLEMME,

19 Defendants.

20 No. CV-09-5023 RJB

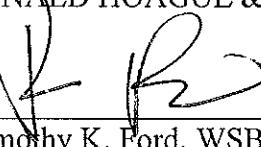
21 REQUEST FOR ENTRY OF JUDGMENT

22 Pursuant to FRCP 68(a), plaintiffs Ralph Close and Laura Larson hereby request that the
23 Clerk enter judgment in favor of plaintiffs Ralph Close and Laura Larson against defendant
24 Pierce County, Washington, in the amount of \$100,000.00, inclusive of costs and fees, pursuant
25 to the attached FRCP 68 Offer of Judgment and Acceptance. As indicated therein, this judgment
26 should be entered against defendant Pierce County, only. A proposed form of Judgment is
27 attached.

28 DATED this 6 day of August, 2009.

29 Respectfully submitted,

30 MacDONALD HOAGUE & BAYLESS

31 By 

32 Timothy K. Ford, WSBA #5986
33 David J. Whedbee, WSBA #35977
34 Attorneys for Plaintiffs

35 REQUEST FOR ENTRY OF JUDGMENT - 1

36 No. CV-09-5023 RJB

37 9178.1 ch063203

38 MACDONALD HOAGUE & BAYLESS
39 705 Second Avenue, Suite 1500
40 Seattle, Washington 98104
41 Tel 206.622.1604 Fax 206.343.3961

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 6th day of August, 2009, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to the following:

Jerry J Moberg, jjimoberg@canfield-associates.com, dawnseverin@canfield-associates.com, jerrymoberg@canfield-associates.com, shareenlaughlin@canfield-associates.com

Ronald LaMar Williams, rwillia@co.pierce.wa.us, pepatvecf@co.pierce.wa.us

Gerald A. Horne, ghorne@co.pierce.wa.us

Frith m. Thiel

REQUEST FOR ENTRY OF JUDGMENT - 2

No. CV-09-5023 RJB

MACDONALD HOAGUE & BAYLESS
705 Second Avenue, Suite 1500
Seattle, Washington 98104
Tel 206 622 1604 Fax 206 343 3961

1 Honorable Robert J. Bryan
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

9 RALPH W. CLOSE and LAURA A. LARSON,
10 individually as parents of the decedent JAMES
11 ROBERT CLOSE,

12 Plaintiffs,

13 v.

14 PIERCE COUNTY, WASHINGTON; PIERCE
15 COUNTY SHERIFF PAUL PASTOR; STEVE
16 PARR; EDWARD CORRELL; JOSEPH
17 GORMAN; and TODD KLEMME,

18 Defendants.

19 No. CV-09-5023 RJB

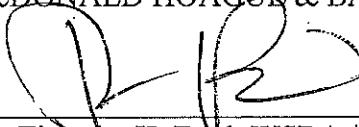
20 NOTICE OF ACCEPTANCE OF OFFER OF
21 JUDGMENT BY DEFENDANT PIERCE
22 COUNTY

23 Plaintiffs Ralph Close and Laura Larson hereby accept the attached Offer of Judgment of
24 defendant Pierce County to have judgment entered against it in the amount of \$100,000.00,
25 including attorneys' fees and costs.

26 DATED this 6 day of August, 2009.

27 Respectfully submitted,

28 MacDONALD HOAGUE & BAYLESS

29 By 
30 Timothy K. Ford, WSBA #5986
31 David J. Whedbee, WSBA #35977
32 Attorneys for Plaintiffs

33 NOTICE OF ACCEPTANCE OF OFFER OF JUDGMENT BY
34 DEFENDANT PIERCE COUNTY - 1

35 No. CV-09-5023 RJB

36 9178.1 ch063201

37 MACDONALD HOAGUE & BAYLESS
38 705 Second Avenue, Suite 1500
39 Seattle, Washington 98104
40 Tel 206.622.1604 Fax 206.343.3961

RECEIVED
AUG 3 2009
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Honorable Robert J. Bryan
U.S. District Judge

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

RALPH W. CLOSE and LAURA A.
LARSON, individually as parents of the
decedent JAMES ROBERT CLOSE.

Plaintiffs, NO. C09-5023 RJB

VS.

OFFER OF JUDGMENT

PIERCE COUNTY, WASHINGTON;
PIERCE COUNTY SHERIFF PAUL
PASTOR; STEVE PARR; EDWARD
CORRELL; JOSEPH GORMAN; and TODD
KLEMME.

Defendants.

Pursuant to FRCP 68 and *Marek v. Chesny*, 473 U.S. 1 (1985), Defendant Pierce

County hereby offers to permit Plaintiffs, Ralph W. Close and Laura A. Larson, to take a judgment against it in this action in the amount, including attorney's fees and costs, of One

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1 Hundred Thousand Dollars (\$100,000). This is a settlement offer made in a case of disputed
2 liability and is not an admission of any fault.

3 DATED this 31st day of July, 2009.

4
5 GERALD A. HORNE
6 Prosecuting Attorney

7 By 
8 RONALD L. WILLIAMS / WSB# 13927
9 Deputy Prosecuting Attorney
Attorneys for Pierce County
PH: 253-798-3612 / FAX: 253-798-6713

10
11 CERTIFICATE OF SERVICE

12 I hereby certify that a true copy of the foregoing OFFER OF JUDGMENT was
13 delivered this 31st day of July, 2009, to ABC-Legal Messengers, Inc., with
appropriate instruction to forward the same to counsel for Plaintiffs as follows:

14 Timothy K. Ford
15 David Whedbee
16 MacDONALD HOAGUE & BAYLESS
17 705 Second Avenue, Suite 1500
Seattle, WA 98104

18 
19 CHRISTINA M. SMITH

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 6th day of August, 2009, pursuant to FRCP 5(b)(2)(E) and 68 and WDLR 5(b), I electronically served the foregoing on the following:

Jerry J Moberg, jerrymoberg@canfield-associates.com

Ronald LaMar Williams, rwillia@co.pierce.wa.us

Zinda m. Thiel

NOTICE OF ACCEPTANCE OF OFFER OF JUDGMENT BY
DEFENDANT PIERCE COUNTY - 2

No. CV-09-5023 RJB

9178,1 ch063201

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